

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,
Plaintiff,

V.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,
Defendants.

C.A. No.: 1:19-CV-10203-IT

**DEFENDANTS COHEN BUSINESS LAW GROUP, PC AND JEFFREY A. COHEN,
ESQ.'S MOTION FOR RECONSIDERATION**

Defendants Cohen Business Law Group, PC, and Jeffrey A. Cohen, Esq. (collectively, the “Firm” or “Defendants”) hereby seek reconsideration of this Court’s Order, dated March 27, 2020, which denied the Firm’s Motion to Dismiss Plaintiff Sonya Larson’s (“Larson”) Complaint and Demand for Trial by Jury (“Complaint”), pursuant to Fed. R. Civ. P. 54(b).

The Court relied primarily upon *58 Swansea Mall Drive, LLC v. Gator Swansea Prop., LLC*, 2016 WL 5946872 (D. Mass. 2016), to find that the Firm was not protected by the litigation privilege. However, *58 Swansea Mall Drive* does not establish the correct standard to be applied in this case. The Court thus made an error in law which must be reversed.

For the reasons set forth in the attached Memorandum of Law, Cohen Business Law Group, P.C. and Jeffrey A. Cohen, Esq. respectfully request that this Court reconsider its Order dated March 27, 2020 and ALLOW their Motion to Dismiss.

REQUEST FOR ORAL ARGUMENT

In accordance with Local Rule 7.1(d), counsel for the Defendants, Cohen Business Law Group, P.C. and Jeffrey A. Cohen, Esquire, hereby requests a hearing for oral argument in connection with this motion.

THE DEFENDANTS,
COHEN BUSINESS LAW GROUP, PC,
AND JEFFREY A. COHEN, ESQUIRE,
BY THEIR ATTORNEYS,

/s/ Matthew H. Greene

DATED: April 9, 2020

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 9th day of April, 2020.

/s/Matthew H. Greene, Esq.